



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
**OREGON OPERATIONS OFFICE**  
811 S.W. 6th Avenue  
Portland, Oregon 97204

December 2, 2005

Mr. Jim McKenna  
Port of Portland & Co-Chairman, Lower Willamette Group  
121 NW Everett  
Portland, Oregon 07209

Mr. Robert Wyatt  
Northwest Natural & Co-Chairman, Lower Willamette Group  
220 Northwest Second Avenue  
Portland, Oregon 97209

Re: Portland Harbor RI/FS  
Identification of Round 3 Data Gaps

Dear Mr. McKenna and Mr. Wyatt:

As you are aware, EPA and its partners have been reviewing the data from the Round 1 and Round 2 sampling events, as well as information in other project deliverables, to develop an understanding of the existing data and to identify additional data that is needed to complete the RI/FS. The purpose of this letter is to provide the Lower Willamette Group (LWG) with the results of our review and to provide guidance on the approach to filling the data gaps in the upcoming Round 3 sampling in 2006 ( "Identification of Round 3 Data Gaps" enclosed).

EPA has identified a significant number of data gaps that need to be addressed during Round 3 of the RI/FS sampling. As we have discussed in our recent management team meetings, we have developed a scoping-level approach that does not identify specific numbers and locations of samples. Rather, it provides a framework for the development of specific data collection efforts. EPA and its partners will be working through mid-January to further refine Round 3 data gaps and develop the details needed for the preparation of sampling plans. We understand that the LWG has also been reviewing the existing data and may have identified specific data gaps as well.

The current project schedule calls for the submittal of the Comprehensive Round 2 Site Characterization Summary and Data Gaps Analysis Report in April 2006, followed by a Round 3 Field Sampling Plan in May 2006. EPA and its partners have taken this time and effort to work on Round 3 data gaps in anticipation of these deliverables and to expedite the turnaround of the report and sampling plans that EPA can approve. We have included some general direction on the process for the next few months, which may require adjustments to current deliverable schedules in order to keep the overall project on schedule.

Round 2 data gathering that has been completed has been focused on sediment and surface water chemistry, benthic toxicity, and surface water chemistry, and ongoing work related to site characterization within the currently identified Portland Harbor study area. The Round 3 needs include additional data to complete the characterization, refine the conceptual site model, complete the ecological and human health risk assessments, and support the feasibility study.

Please note that while our data scoping exercise focused on identifying the data needed to complete the RI/FS, several Round 2 data gathering and analysis efforts are still underway. As a result, there may be additional data needs based on review of the data currently being gathered, and the development of the food web model, the hydrodynamic model, the benthic assessment, and alternatives development and analysis for the feasibility study.

We are looking forward to our upcoming meeting on December 13th to discuss the results of EPA's identification of Round 3 data gaps and the process for moving forward with the development of appropriate field sampling plans. If you have any questions, please call Chip Humphrey at (503) 326-2678 or Eric Blischke at (503) 326-0039. All legal inquiries should be directed to Lori Cora at (206) 553-1115.

Sincerely,

Chip Humphrey  
Eric Blischke  
Remedial Project Managers

Enclosures

Identification of Round 3 Data Gaps  
Tables and Figures

cc: Greg Ulirsch, ATSDR  
Rob Neely, NOAA  
Ted Buerger, US Fish and Wildlife Service  
Preston Sleeper, Department of Interior  
Jim Anderson, DEQ  
Kurt Burkholder, Oregon DOJ  
Rick Keppler, Oregon Department of Fish and Wildlife  
Amanda Guay, Oregon Public Health Branch  
Jeff Baker, Confederated Tribes of Grand Ronde  
Tom Downey, Confederated Tribes of Siletz  
Audie Huber, Confederated Tribes of Umatilla  
Brian Cunningham, Confederated Tribes of Warm Springs  
Erin Madden, Nez Perce Tribe  
Paul Ward, Confederated Tribes of Yakama Nation  
Valerie Lee, Environment International  
Keith Pine, Integral Consulting

